

In the matter of:

RM-10355

A Petition to change Part 97.113(e) of the Commission's Rules to permit retransmission of manned spacecraft communications from International Space Station in addition to Space Shuttle

Comments of the Jet Propulsion Laboratory Amateur Radio Club

#### Introduction

The Jet Propulsion Laboratory Amateur Radio Club (JPLARC) is a division of the employee recreation club at the Jet Propulsion Laboratory (JPL), a federally-funded research and development center (FFRDC) operated under contract by the California Institute of Technology (Caltech) for the National Aeronautics and Space Administration (NASA). The approximately one hundred amateur radio operators who are voting members of the JPLARC, through their Board of Directors and President, submit the following comments in support of the proposed rule making.

#### Comments

The JPLARC has retransmitted Space Shuttle audio communications on amateur radio service VHF allocations during every mission, beginning with STS-1 under Special Temporary Authority granted by the Commission, and later under the rules codified in 47 CFR 97.113(e). These retransmissions have been of great interest to amateur radio operators and educators in the Los Angeles Metropolitan Area and adjacent regions of Southern California.

Members of the JPLARC are intimately familiar with both Space Shuttle and International Space Station (ISS) audio communications. The latter is available presently by two means: (1) a terrestrial leased circuit originating at the Johnson Space Center (JSC) and sent to the various NASA field centers called Mission Audio, and (2) a one-hour, live, commented feed transmitted daily over the publicly available C-band NASA Television channel. The audio communications consists of English from JSC and Russian (with simultaneous English technical translation) from the Mission Control Center in Korolev outside Moscow. Our long-term observations indicate that ISS audio communications are less frequent and generally of shorter duration than those conducted with the Space Shuttle and are completely harmonious with the spirit and intent of the Commission when it adopted the current wording of 47 CFR 97.113(e). With the advancement of mankind's presence into the cosmos aboard the ISS and, hopefully, beyond, it is indeed time to adopt the broad and flexible wording of the proposed rulemaking, thereby updating and accommodating circumstances that could not have been reasonably foreseen by the Commission when it adopted wording specifically referencing the Space Shuttle. In this regard, the JPLARC requests the use of the proposed text, "...or other manned spacecraft...", so as to provide for the evolution of our spacefaring systems.

The JPLARC would furthermore point out that with increasing use of the amateur radio station aboard the International Space Station, ISS audio communications become a vital source of up-to-date information relating to current or upcoming amateur radio operating activity by the crew. Access to this information by the general amateur radio community through the retransmission of the Mission Audio circuit on amateur radio service frequencies will surely be welcome.

For these reasons the JPLARC urges the Commission to adopt the proposed rulemaking at the earliest possible date and to utilize the proposed wording, "...or other manned spacecraft...", so as to provide the greatest future flexibility.

Respectfully submitted this Seventh Day of February, 2002.

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